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October 8, 2015

Stuart Dearden
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Subject: Outfall 22B IRAM Performance Monitoring Second Quarter 2015 Report
RP-Portland Site
ECSI #155

Dear Mr. Dearden:

The Oregon Department of Environmental Quality (DEQ) received the subject monitoring report on September 22, 2015. The report was prepared by Golder Associates Inc. for StarLink Logistics Inc. (StarLink) to document the 2015 second quarter results of water discharge sampling and analysis from Outfall 22B. Thank you for the submittal. DEQ's review comments are presented below.

Specific Comments

1. **Page 6, 4.2 Field Parameter Results.** The report identifies the NL-Gould Superfund Site remedy as the likely source of elevated pH in groundwater along the edge of the ESCO property due to weathering of foundry sand material and the neutralization of battery acid that likely occurred as part of battery waste stabilization efforts on their site. DEQ notes that several remedial actions were conducted to neutralize herbicide production waste in former Doane Lake and West Doane Lake. As presented in the *RI/SCE Report Addendum*[1] Appendix B-Table Showing Status of Certain Actions Related to Former Rhone-Poulenc Operations, lime was added to former Doane Lake in 1965 to increase pH to between 8 and 9 in order to treat odor issues associated with herbicide production waste. In 1980, the Lake Area Drainage Ditch was treated with lime, and West Doane Lake was also treated with lime between 1980 and 1987. Please include this information and provide additional detail if available to document other potential sources and causes related to elevated pH in the vicinity of former Doane Lake sediments in future applicable submittals to DEQ.

2. **Page 12, 8.0 Closing and Round 3 Summary.** The following modifications to the *Outfall 22B IRAM Performance Monitoring, Sampling and Analysis Plan* (SAP) are proposed by StarLink for sampling in the 3rd Quarter 2015; 1) sampling only if surface flow into catch basins is not observed, 2) extending the dry period from 72 to 144 hours, and 3) eliminating chlorinated herbicides, cadmium, calcium, chromium, iron, magnesium, mercury, nickel, and zinc from the suite of analytes. As stated in Section 3.2 of the SAP, StarLink may request a reduction in the suite of analytes based on the results

[1] (DEQ 2014) *Rhone-Poulenc Remedial Investigation Report: Addendum-RI/SCE (November 19, 2010).* Prepared by Oregon Department of Environmental Quality. April 2015.

of the first two years of monitoring, therefore, DEQ does not approve this proposed change. Also, DEQ does not approve the proposed change to sample only if surface flow is not observed entering 22B system catch basins. DEQ suggests that StarLink may elect to conduct additional sampling of surface water discharge into catch basins to support conclusions that catch basin flow is contributing to the results of sampling conducted at specific locations in the 22B system. Last, extending the dry period duration from 72 to 144 hours is not approved considering that there may not be a 144 hour dry period during quarters with frequent and persistent rainfall.

3. **Table 5: Outfall 22B 2nd Quarter 2015 IRAM Performance Monitoring-Detected Results Summary.** The data validation report does not provide rational for reporting estimated maximum possible concentration (EMPC) results as "U" (The constituent was analyzed for, but was not detected above the reported sample quantitation limit). As previously discussed with StarLink, DEQ generally follows EPA guidance regarding the use of qualified data in risk assessments. The most commonly encountered data qualifier is J, indicating an estimated value. J-qualified data are considered the same as unqualified data for risk assessment purposes. Similarly, EMPC qualified data are also considered the same as unqualified data for risk assessment purposes.

   Please revise the report to include updated summary tables that appropriately indicate EMPC detections. DEQ also requests that StarLink confirm in an e-mail or other written response that EMPC values were included in all site risk assessments, and are also presented correctly in the RI/SCE Report. Please clearly indicate if the value presented as valid sampling data is an EMPC detected value in future submittals to DEQ.

DEQ also notes that the report was not submitted within 30 days from receipt of the laboratory data, in accordance with the DEQ- approved work plan[2]. The last data report in the submittal is dated July 31, 2015 and the submittal was not received by DEQ until September 22, 2015. Please submit future reports in accordance with the DEQ-approved work plan.

DEQ appreciates the work conducted by StarLink to prepare the quarterly monitoring report. Please feel free to contact me at 503 229-6748 if you have any questions.

Sincerely,

Scott Manzano, Project Manager
DEQ NWR Cleanup Program

C: *Joan Underwood, Quantum Management Group*
Jim Benedict, Cable, Huston, Benedict, Haagensen & Lloyd
Eva DeMaria/EPA
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ECSI #155

[2] DEQ 2015. *Final Outfall 22B IRAM Performance Monitoring, Sampling and Analysis Plan, Former Rhone-Poulenc-Portland Site*. Prepared by Oregon Department of Environmental Quality. February 2015.